

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
TV TRANSLATOR STATION W40AN (FACILITY ID 4151)
ESCANABA, MICHIGAN
CH 40 4.04 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station W40AN. Station W40AN is licensed to operate on analog channel 40 with a directional antenna maximum (visual) effective radiated power (ERP) of 20.2 kW and an antenna height above mean sea level (RCAMSL) of 280 meters (BLTT-19920108JH).

Proposed Facilities

This application proposes digital operation on the current channel (40), at the current transmitter site and with the same antenna. A slight correction to the RCAMSL has been made due to tower registration. The transmitter site coordinates remain (NAD27): 45-46-56 N, 87-06-04 W. An Andrew (AND) ALP16L2-HSW, oriented at 277 degrees True, with a maximum ERP of 4.04 kW and antenna RCAMSL of 281.9 meters is proposed. The existing 75.6 meter structure (248 feet) is registered with the FCC (ASRN: 1000738).

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed W40AN facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 71 meters above ground level. The proposed maximum ERP is 4.04 kW. Based on a conservative downward relative field value of 0.5, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 0.007 mW/cm^2 , which is less than 5% of the FCC's recommended limit of 0.42 mW/cm^2 for channel 40 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective

clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

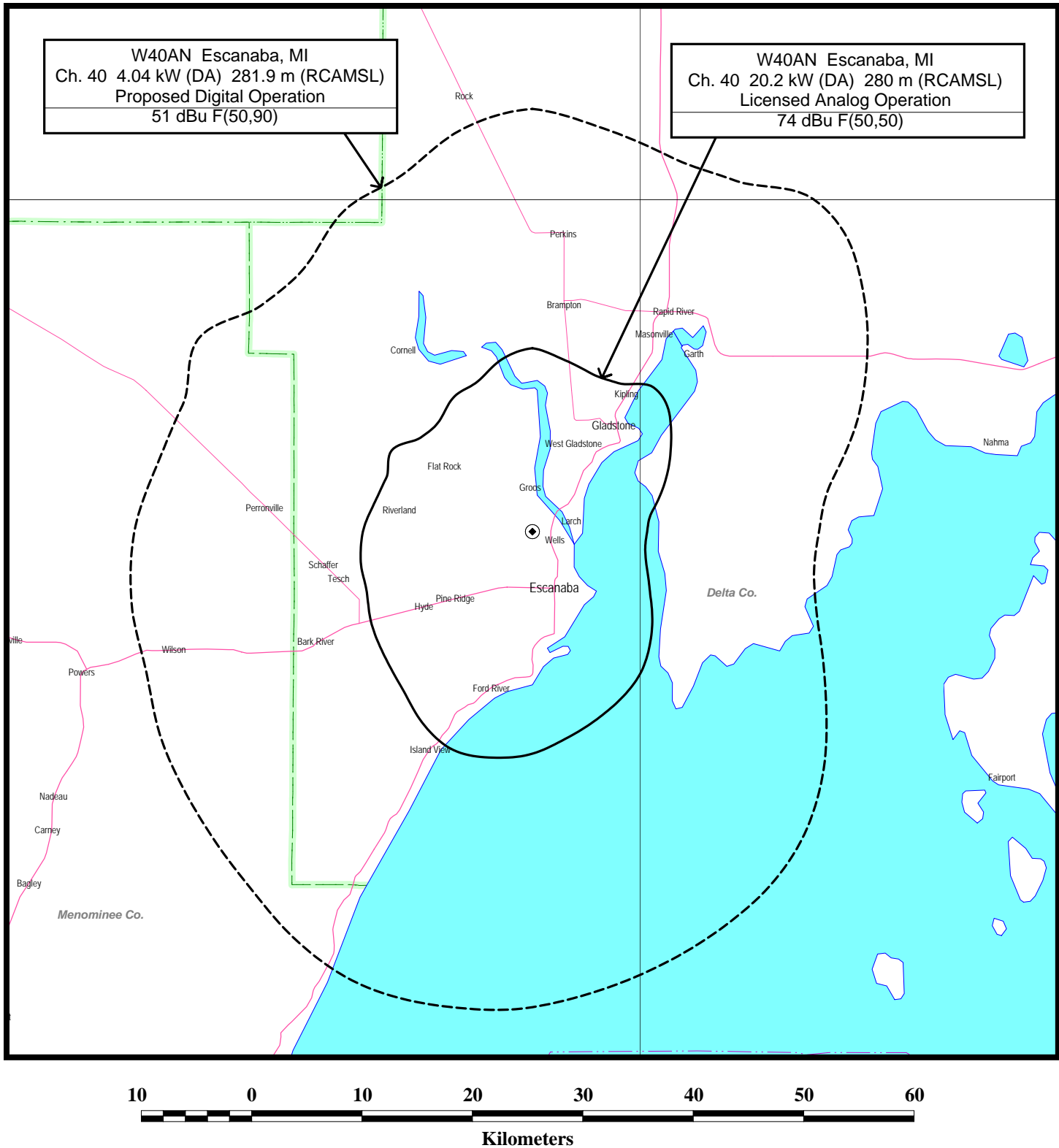


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

TV TRANSLATOR STATION W40AN
ESCANABA, MICHIGAN
CH 40 4.04 KW (DA) 281.9 M (RCAMSL)

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